

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Evergy Missouri West, Inc. d/b/a)
Evergy Missouri West’s Request for Authority to)
Implement a General Rate Increase for Electric)
Service)
File No. ER-2024-0189

STAFF STATEMENT OF DISCOVERY DISAGREEMENTS AND CONCERNS

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), through the undersigned counsel, and for its *Statement of Discovery Disagreement and Concerns* respectfully states as follows:

1. Staff’s concerns are as follows regarding responses received from Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“EMW” or “Company”):

- a. DR 257.1, Customer Counts and Usage corresponding to Revenue estimates. This response was initially due by April 23, 2024. The Company provided an initial response on April 25, 2024, and a supplemental response on May 7, 2024 after Staff reached out with its concerns. Neither response includes usage levels, by month corresponding to lines 42-58 in the provided workpapers.
- b. DR 262(b) and (d), Requested TOU Deferral. EMW’s response was not responsive to the question asked in either subpart.
- c. DR 262.1, Estimated Costs: The Company’s response is not responsive to the questions asked in this DR.
- d. DR 295, Interval Data for Discounted Customers: Staff requires the hourly load of customers receiving the discounted rate to determine whether the application of the discounted rate is adequate (or not) to

cover the variable cost and provide a positive contribution to fixed costs.

2. The requested information is necessary for Staff to prepare its case and to audit the Company's compliance with applicable Missouri statutes, Commission regulations, orders, and approved stipulations.

WHEREFORE, Staff submits its' *Statement of Discovery Disagreement or Concerns* in advance of the Discovery Conference currently scheduled for May 14, 2024 at 10:00 a.m.

Respectfully Submitted,

/s/ Travis J. Pringle

Travis J. Pringle

Missouri Bar No. 71128

Chief Deputy Counsel

Attorney for the Staff of the

Missouri Public Service Commission

P.O. Box 360

Jefferson City, Mo 65102-0360

(573) 751-5700 (Telephone)

(573) 526-1500 (Facsimile)

(Email) travis.pringle@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing were mailed, electronically mailed, or hand-delivered to all parties and/or all counsel(s) of record on this 10th day of May, 2024.

/s/ Travis J. Pringle